

February 13, 2003

Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Review of the Section 251 Unbundling Obligations of Incumbent Local Exchange Carriers – Ex Parte Filing. CC Docket No. 01-338

Dear Ms. Dortch:

AARP appreciates having the opportunity to file this ex parte submission on the issue of the Unbundled Network Elements Platform (UNE-P). In short, AARP is generally supportive of the framework outlined in the proposal submitted by the National Association of Regulatory Utility Commissioners (NARUC) on February 6. The NARUC proposal is consistent with AARP's goal of adopting regulations that will promote competition, mitigate rate increases and retain consumer protections.

AARP, as a long-time supporter of many of the provisions in the Telecommunications Act of 1996, has been troubled by recent actions by the Commission to amend critical provisions in the Act that would alter the existing UNE-P measures. While we continue to believe that facilities-based competition should be the end result, in the interim it is imperative that competitive local exchange carriers have the opportunity to lease items from the unbundled network elements platform. We urge the Commission to retain the competitive UNE-P framework as outlined in the NARUC proposal. By doing so, competition will be enhanced and consumers protected.

Sincerely,

David Certner
Director
Federal Affairs